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**Sent:** Wednesday, December 29, 2010 4:27 PM  
**To:** Finger, Theresa  
**Subject:** Preserving Electronic Documents

I have a few comments arising from my examination of the proposed regulations governing the question of preserving electronic documents long term and assuring their authenticity when users need to retrieve them. The authors of this proposal recognize that with the volume of electronic records increasing by an estimated 30 percent annually due to the application of more computer technology, there are increasing challenges in the "urgency" to manage the various forms of records created, generated and stored on various document management systems. Simply the task is to guarantee that information converted and stored on digital media is secure from loss and can be accessed with 100% fidelity to the original when it has been stored for a long period of time typically over 10 years.

As computer technology---software, hardware and storage media continue to change at a rapid rate, a number of issues including risk of content loss are occurring. Another important concern is the susceptibility of the information in records requiring long term preservation to intentional or accidental alteration. This issue is particularly relevant to Records management since we are embarking on digitizing the Board of Directors and other official District documents created in the past 30 or more years.

Section 22620.7 relies on the June 15, 2009 ARP -1 attempts to establish guidelines and "best practices" that are directed towards the practical problems created by these risks. By definition, a trusted system "ensures that all electronically stored information ...can be considered true and an accurate copy of the original information received regardless of format". Within these guidelines are the requirement that an electronic record must be written to media that does not permit additions, deletions and that storage processes must be verified through periodic audits. Compliance with the latter places a large amount of responsibility on the information technology group in an organization and can be affected by the resources available to this group as well as the inclination to devote time and effort to long term record preservation, especially since the complexities of storing digital records continue to multiply at such notable speed.

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